

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND

HUAIZHAO LIU and CHARLOTTE  
ZHANG,

Plaintiffs,

v.

CIPING HUANG,

Defendant.

No. 23-cv-2134-MJM

Judge Matthew J. Maddox

**JOINT STATUS REPORT**

Pursuant to this Court's August 13, 2024 Scheduling Order, Dkt. 40, the parties hereby submit this joint status report on the parties' conference as to deposition hours and electronically stored information.

***Deposition hours.*** The parties agree that each side may have a maximum of 35 hours of deposition time.

***Electronically stored information.*** Plaintiffs had suggested that both Plaintiff Liu and Defendant Huang create forensic images of certain electronic devices. Defendant considered Plaintiffs' proposal but ultimately disagreed and proposed that the parties proceed without creating such images. Plaintiffs agree to doing so but reserve the right to move the Court for an order that Defendant Huang make such an image should Plaintiffs develop evidence that Defendant is not complying with Defendant's discovery obligations. Defendant similarly reserves that right.

***Other matters.*** The parties agree that no attorney-client communications occurring after this action was first filed need be included on any privilege log.

Date: August 20, 2024

Respectfully submitted,

/s/ Times Wang

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